

### **REMARKS**

Reconsideration is requested.

Claim 115 is amended. Claims 23-30, 113-114, and 116-117 have been withdrawn from consideration. Such withdrawn claims must be rejoined and allowed if the independent claims from which the withdrawn claims depend are found to be allowable. Claims 22, 31-34, 92, 93, 100-106, 109-112, and 115 are in the application for consideration.

Claim 115 stands rejected under 35 U.S.C. §112, second paragraph, as being indefinite; Claims 110 and 112 stand rejected under 35 U.S.C. §102(b) as being anticipated by Neu (U.S. Patent No. 5,839,337); Claims 22, 92-93, 101-106, 109, and 115 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Neu in view of Patadia et al. (U.S. Patent No. 6,146,504); Claims 31-34 and 100 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Neu in view of Patadia and further in view of Applicant's Admitted Prior Art (AAPA); and Claim 111 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Neu.

Claim 115 has been amended to overcome minor informalities recited therein. Amended claim 115 is believed to be definite under 35 U.S.C. §112, second paragraph. Withdrawal of rejection of claim 115 is requested.

Rejection of claim 110 under 35 U.S.C. §102(b) as being anticipated by Neu is respectfully traversed.

Claim 110 recites, in part, a plurality of blocks formed as one piece with the panel and extending upward from the uppermost surface of the panel thereby creating a recessed portion on the panel, the plurality of blocks configured to support the board leaving the integrated circuit chip components extending in the recessed portion between the plurality of blocks and the uppermost surface of the panel. (Emphasis Added)

The Office Action alleges that Neu's Figure 4 discloses the above-recited feature of claim 110. Neu's Figure 4 is reproduced by the Examiner on page 3 of the Office Action with Examiner made notations. Specifically, the Office Action alleges that features "B" and "C" as shown in the "Examiner reproduced figure" on page 3 of the Office Action is analogous to the plurality of blocks, and recessed portion, respectively, as recited in claim 110. Applicant respectfully traverses this assertion in view of the following:

Neu's Figure 4 shows a carrier 19 having a carrier plate or pallet 62. Pallet 62 supports a plurality of carrier strips each having a plurality of semiconductor devices 3 which are placed downwardly and snugly fit within spaced cavities 63 dimensioned correspondingly to the devices 3. For trimming the strips, the devices 3 are fit into the cavity 63 in a desired position. See Neu's col. 5, lines 20-35.

Thus, the features "B" of Neu's pallet 62 alleged by the Examiner as the "plurality of blocks" are not formed to extend upward from the uppermost surface of the pallet 62. In Neu, the alleged blocks B are shown to have a surface that is

coplanar with an upper surface of the pallet 62. Therefore, these alleged blocks "B" do not extend upward from the upper surface of the pallet 62. Since the alleged blocks "B" do not extend upward from the upper surface of the pallet 62, they cannot form a recessed portion on the pallet 62. At least for the above-noted reasons, claim 110 is not anticipated by Neu.

Further, Neu's Figure 4 shows the cavities 63 as being formed within the thickness of the pallet 62. The cavities 63 are specifically dimensioned to correspond to the devices 3. Thus, these cavities 63, alleged to be the "recessed portion" by the Examiner, are independently formed in the pallet 62 and not due to the alleged plurality of blocks "B" extending upward from the upper surface of the pallet 62. In sharp contrast to this disclosure of Neu, in the claimed invention, the plurality of blocks extend upward from the uppermost surface of the panel thereby creating a recessed portion on the panel.

In addition to the above, claim 110 specifically recites that the integrated circuit chip components extend in the recessed portion between the plurality of blocks and the uppermost surface of the panel.

Neu's recessed portion "C" is formed within the thickness of the pallet 62 and therefore it cannot be asserted as being formed between the plurality of blocks and the uppermost surface of the pallet 62.

In view of the above noted distinctions, Neu fails to identically teach or suggest all the elements of claim 110. Accordingly, Neu fails to anticipate claim 110. Claim 110 is therefore believed to be allowable.

As claims 111-112 depend on claim 110, they too are allowable.

Claims 22, 92-93, 101-106, 109, and 115 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Neu in view of Patadia.

Claim 22 recites, in part, a plurality of blocks over the panel, the plurality of blocks having curved upper surfaces and configured to form a recessed portion over an uppermost surface of the panel, the plurality of blocks being configured to support the board while leaving the integrated circuit chip components in the recessed portion extending between the block upper surfaces and the uppermost surface of the panel. (Emphasis Added)

As demonstrated above with respect to claim 110, Neu fails to teach or suggest the above-recited feature of claim 22. Patadia merely discloses a substrate support lift apparatus. Patadia fails to cure Neu's deficiencies. The combination of Neu and Patadia fails to teach or suggest all the elements of claim 22.

Accordingly, claim 22 is believed to be allowable.

As claims 92-93, 101-106, and 109 depend on claim 22, they too are believed to be allowable.

Claim 115 is believed to be allowable at least for similar reasons set forth above with regard to claim 22 in addition to its own independently recited features.

Rejection of claims 31-34 and 100 under 35 U.S.C. §103(a) as being unpatentable over Neu in view of Patadia and further in view of Applicant's Admitted Prior Art (AAPA) is respectfully traversed.

Claims 31-34 and 100 depend on claim 22 which was demonstrated to be allowable over the combination of Neu and Patadia. AAPA fails to cure the deficiencies of the combination of Neu and Patadia. For example, the combination of Neu, Patadia, and AAPA fails to teach or suggest "a plurality of blocks having curved upper surfaces and configured to form a recessed portion over an uppermost surface of the panel, the plurality of blocks being configured to support the board while leaving the integrated circuit chip components in the recessed portion extending between the block upper surfaces and the uppermost surface of the panel" as recited in claim 22.

Claims 31-34 and 100 which depend on claim 22 limit the scope of claim 22 and include further patentable features. Accordingly, claim 31-34 and 100 are believed to be allowable.

This application is believed to be in immediate condition for allowance, and action to that end is requested. If the Examiner's next anticipated action is to be anything other than a Notice of Allowance, the undersigned respectfully requests a telephone interview prior to issuance of any such subsequent action.

Respectfully submitted,

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